

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Bertha E Gutierrez,

Case No. 8-20-70195-reg

Chapter 7

HON. Robert E. Grossman

Debtor(s).

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NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the annexed application of attorneys for DEUTSCHE BANK NATIONAL TRUST COMPANY AS TRUSTEE FOR MERRILL LYNCH MORTGAGE INVESTORS TRUST, MORTGAGE LOAN ASSET-BACKED CERTIFICATES, SERIES 2007-MLN1 (hereinafter “Movant”), the undersigned respectfully moves this Court for an order, pursuant to 11 U.S.C. § 362(d)(1) and (d)(2) terminating the automatic stay herein as to the lien interest of Movant in real property of the debtor commonly known as 74-14 91 Avenue, Woodhaven, NY 11421 together with Movant attorney’s fees and costs as set forth in amount in the motion and such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that this motion shall be returnable on the 1st day of April, 2020 at 9:30 a.m. of that day, or as soon thereafter as counsel can be heard, before the Hon. Robert E. Grossman at United States Bankruptcy Court, Eastern District of New York, Alfonse M. D'Amato Federal Courthouse, 290 Federal Plaza, Central Islip, New York 11722, Courtroom 860.

PURSUANT TO BANKRUPTCY RULE 9014 AND LOCAL BANKRUPTCY

RULE 9006-1(b), IF YOU INTEND TO OPPOSE THE MOTION, YOU MUST SERVE ON MOVANT'S COUNSEL AND FILE WITH THE CLERK OF THE BANKRUPTCY COURT, WRITTEN OPPOSITION TO THE MOTION SO AS TO ENSURE ACTUAL RECEIPT NOT LATER THAN SEVEN (7) DAYS BEFORE THE RETURN DATE.

Dated: January 30, 2020
Westbury, NY

By: /s/ Barbara Whipple
Barbara Whipple, Esq.
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TO:

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U.S. Trustee

United States Trustee
Long Island Federal Courthouse
560 Federal Plaza - Room 560
Central Islip, NY 11722-4437

Chamber's Copy

Hon. Robert E. Grossman
United States Bankruptcy Court
Eastern District of New York
Alfonse M. D'Amato Federal Courthouse
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